



TO: Clerk's Office
UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

APPLICATION FOR LEAVE
TO FILE DOCUMENT UNDER SEAL

UNITED STATES

-v.-
IZUCHUKWU OKOYE
Docket Number

SUBMITTED BY: Plaintiff _____ Defendant _____ DOJ

Name: Laura Zuckerwise

Firm Name: USAO-EDNY

Address: 271 Cadman Plaza East

Brooklyn, NY 11201

Phone Number: 718-254-6204

E-Mail Address: laura.zuckerwise@usdoj.gov

INDICATE UPON THE PUBLIC DOCKET SHEET: YES NO
If yes, state description of document to be entered on docket sheet:

A) If pursuant to a prior Court Order:
Docket Number of Case in Which Entered: _____
Judge/Magistrate Judge: _____
Date Entered: _____

21 MJ 1445

B) If a new application, the statute, regulation, or other legal basis that authorizes filing under seal
Ongoing criminal investigation

ORDERED SEALED AND PLACED IN THE CLERK'S OFFICE,
AND MAY NOT BE UNSEALED UNLESS ORDERED BY
THE COURT.

DATED: Brooklyn
December 31, 2021
NEW YORK

U.S. MAGISTRATE JUDGE *Marcia M. Henry*

RECEIVED IN CLERK'S OFFICE December 31, 2021
DATE

MANDATORY CERTIFICATION OF SERVICE:

A.) A copy of this application either has been or will be promptly served upon all parties to this action, B.) Service is excused by 31 U.S.C. 3730(b), or by the following other statute or regulation: _____; or C.) This is a criminal document submitted, and flight public safety, or security are significant concerns.
(Check one)

December 31, 2021
DATE
/s/ Laura Zuckerwise
SIGNATURE

SK:LZ

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
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C O M P L A I N T

UNITED STATES OF AMERICA

(18 U.S.C. § 1344)

- against -

Case No. 21-MJ- 1445

IZUCHUKWU OKOYE,

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

ABIGAIL TYRRELL, being duly sworn, deposes and states that she is a Special Agent with the United States Secret Service, duly appointed according to law and acting as such.

On or about May 22, 2019, within the Eastern District of New York, the defendant IZUCHUKWU OKOYE did knowingly and intentionally execute a scheme and artifice to defraud JP Morgan Chase, a financial institution, the deposits of which were insured by the Federal Deposit Insurance Corporation, in violation of Title 18, United States Code, Section 1344(1)).

(Title 18, United States Code, Sections 1344(1), 2 and 3551 et seq., Title 18, United States Code, Sections 2 and 3551 et seq.)

The source of your deponent's information and the grounds for her belief are as follows:¹

1. I am a Special Agent with the United States Secret Service ("USSS") and

¹ Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

have been for approximately four years. During my tenure at USSS and through my training and experience, I have participated in investigations related to bank fraud.

2. I am familiar with the facts and circumstances set forth below from my participation in the investigation; my review of the investigative file; and from reports of other law enforcement officers involved in the investigation.

3. Except as explicitly set forth below, I have not distinguished in this affidavit between facts of which I have personal knowledge and facts I learned from other law enforcement agents. In addition, where the actions, statements and conversations of others are reported herein, they are reported in sum and substance and in part.

4. On or about May 22, 2019, IZUCHUKWU OKOYE opened a JPMorgan Chase Business Checking Account in the name of CHRISWILS AUTO INC. at a JPMorgan Chase branch located at 74-07 Eliot Avenue, in Middle Village, Queens, New York. OKOYE identified himself falsely to JPMorgan Chase as Christopher William and presented a false identification document purporting to be a Republic of Kenya passport with OKOYE's picture, showing the name "William Christopher." Law enforcement obtained a photograph of this false passport:



5. Based on documents and records obtained through the investigation, OKOYE's true name is "IZUCHUKWU OKOYE." OKOYE traveled to the United States under the name "IZUCHUKWU OKOYE." He also secured a non-immigrant Visa using the name "IZUCHUKWU OKOYE" and has registered a vehicle using the name "IZUCHUKWU OKOYE." Information obtained from the New York State Department of Motor Vehicles includes a photograph that resembles the likeness in the false passport and the name "IZUCHUKWU OKOYE," as follows:

DMV Photo	
Subject Information	
Name:	OKOYE,IZUCHUKWU,V
ClientID:	[REDACTED]
Case Number:	[REDACTED]
DMV Transaction Number:	[REDACTED]
DMV Transaction Date/Time:	2020-04-15 13:59:12:003



6. In the course of opening the CHRISWILS AUTO INC. Business Checking Account, OKOYE filled out a Business Signature Card using the name Christopher William, and he signed the document. Above the name and signature was an acknowledgement that stated, among other things, "The Depositor certifies that the information provided to the Bank is true to the best of its knowledge . . . "

WHEREFORE, your deponent respectfully requests that the defendant
IZUCHUKWU OKOYE, be dealt with according to law.

Abigail Tyrrell
ABIGAIL TYRRELL
Special Agent
United States Secret Service

by telephone
Sworn to before me this
31st day of December, 2021^A

Marcia M. Henry
THE HONORABLE MARCIA M. HENRY
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK

UNITED STATES DISTRICT COURT
for the
Eastern District of New York

United States of America

v.

IZUCHUKWU OKOYE

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Case No. 21 MJ 1445

Defendant

ARREST WARRANT

To: Any authorized law enforcement officer

YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay

(name of person to be arrested) IZUCHUKWU OKOYE,

who is accused of an offense or violation based on the following document filed with the court:

- Indictment Superseding Indictment Information Superseding Information Complaint
 Probation Violation Petition Supervised Release Violation Petition Violation Notice Order of the Court

This offense is briefly described as follows:

Bank fraud, in violation of Title 18, United States Code, Section 1344(1)).

Date: December 31, 2021

Marcia M. Henry
Issuing officer's signature

City and state: Brooklyn, New York

The Honorable Marcia M. Henry, Magistrate Judge, EDNY
Printed name and title

Return

This warrant was received on (date) _____, and the person was arrested on (date) _____
at (city and state) _____.

Date: _____

Arresting officer's signature

Printed name and title

This second page contains personal identifiers provided for law-enforcement use only and therefore should not be filed in court with the executed warrant unless under seal.

(Not for Public Disclosure)

Name of defendant/offender: _____

Known aliases: _____

Last known residence: _____

Prior addresses to which defendant/offender may still have ties: _____

Last known employment: _____

Last known telephone numbers: _____

Place of birth: _____

Date of birth: _____

Social Security number: _____

Height: _____ Weight: _____

Sex: _____ Race: _____

Hair: _____ Eyes: _____

Scars, tattoos, other distinguishing marks: _____

History of violence, weapons, drug use: _____

Known family, friends, and other associates (*name, relation, address, phone number*): _____

FBI number: _____

Complete description of auto: _____

Investigative agency and address: _____

Name and telephone numbers (office and cell) of pretrial services or probation officer (*if applicable*): _____

Date of last contact with pretrial services or probation officer (*if applicable*): _____